

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION NO: _____

A.R., by and through her mother,)	
D.R.)	
Plaintiff,)	
)	
v.)	MOTION FOR LEAVE TO
)	PROCEED USING PSEUDONYM
)	
WAKE COUNTY BOARD OF)	
BOARD OF EDUCATION)	
)	
Defendant.)	
_____)	

Plaintiff, A.R., by and through her mother, D.R., and the undersigned counsel, respectfully requests that this Court grant Plaintiff leave to proceed under a pseudonym, specifically, her initials. A.R. is a minor and was a minor at all times relevant to the Complaint. A.R. would be readily identifiable if D.R. was required to use her legal name, and thus Plaintiff requests leave to proceed using a pseudonym, also her initials, for A.R.'s mother.

Plaintiff requests this remedy to prevent disclosure both as s student, pursuant to the Family Educational Rights and Privacy Act of 1974 ("FERPA") and as the victim of sex-based violence. Disclosure of A.R. or D.R.'s legal names would cause irreparable harm for A.R., including *inter alia*, the loss of her privacy rights.

Plaintiff will disclose the identity of A.R. and D.R. to Defendant and Defendant's counsel once identified. Therefore, no prejudice will be suffered by any party if the Court grants this motion.

Respectfully submitted.

This the 27th day of January, 2022.

THE LAW OFFICE OF NEUBIA L. HARRIS, PLLC,
ATTORNEYS FOR PETITIONERS

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